

## **GULFCO FACT SHEET**

### **TOPIC**

Approach for proceeding with Gulfco Site

### **REQUESTED ACTION**

Concur with approach

### **BACKGROUND INFORMATION**

EPA and the Gulfco PRPs held a conference call on 2/8/09 to discuss the path forward.

### **CURRENT STATUS**

The Gulfco PRPs are performing the RI/FS, which is about 75% complete.

### **FUTURE/PROPOSED APPROACH**

- Negotiate a time-critical removal AOC for the above ground storage tanks in the southern area; include recovery of past/future costs. PRPs perform the removal.
- PRPs continue RI/FS required by the UAO.
- Perform an “early” southern area RI/FS for soil, sediment, & surface water – southern OU (excludes ground water) meeting requirements (except schedule) of the UAO, for approval. This “early” RI/FS will provide information for a southern OU ROD. PRPs provide a schedule for this work for planning purposes only. The early RI/FS will not trigger UAO requirements since its being done outside of the UAO.
- PRPs will place institutional controls (ICs) for the southern OU as necessary based on a commercial/industrial land use scenario & to restrict ground water use until a decision (ROD) is completed for the rest of the Site (i.e., ground water & the northern area).
- Issue a southern OU ROD based on “early” RI/FS findings. With any necessary ICs already in place, then the ROD may be a no-action ROD assuming no unacceptable risks & no other issues.
- Performance of an “early” southern OU RI/FS and placement of any institutional controls would not be required in the AOC – a RI/FS it is already required by the UAO, and ICs, if necessary, will support the issuance of a no-action ROD.
- Do a partial delisting for the southern OU after necessary actions are done.
- Complete the RI/FS required by the UAO. The “early” southern OU RI/FS will be included in the site-wide RI/FS – no duplication.

### **PURPOSE**

Allow deletion & reuse of the southern area while the ground water investigation is continuing. The ground water is expected to take significantly longer since DNAPL may have contaminated a number of deeper water zones (two uppermost zones are now known to be contaminated).

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